

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

FILED

OCT - 2 2013

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
XR B Green
DEPUTY CLERK

UNITED STATES OF AMERICA,

Plaintiff,

v.

IVAN GONZALES (1)

and

ASHLEY NICOLE GONZALES (2)

Defendants.

§
§
§
§
§
§
§
§
§
§

SA-13-CR-233

SUPERSEDING INFORMATION

[Violation:

18 U.S.C § 1591(a),

Sex Trafficking of Children,

COUNT 1,

18 U.S.C. § 4,

Misprision of Felony,

COUNT 2]

THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE
[18 U.S.C. § 1591(a)]

That on or about the 21st day of December, 2012, within the Western District of Texas,
the Defendant,

IVAN GONZALES (1)

did knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport,
provide, obtain and maintain, by any means a person, that is B.S., knowing, and in reckless
disregard of the fact, that B.S. had not attained the age of 18 years and would be caused to engage
in a commercial sex act; in violation of Title 18, United States Code, Sections 1591(a), 1591(b)(2)
and Title 18, United States Code, Section 2.

COUNT TWO
[18 U.S.C. § 4]

That on or about the 21st day of December, 2012, within the Western District of Texas,
the Defendant,


ASHLEY GONZALES (2)

having knowledge of the actual commission of a felony cognizable by a court of the United States,

to wit, Sex Trafficking of Children, did conceal the same by communicating instructions to B.S. via text messages, and did not as soon as possible make known the same to some judge or other person in civil or military authority under the United States, in violation of Title 18, United States Code, Section 4.

Respectfully submitted,

ROBERT PITMAN
UNITED STATES ATTORNEY

BY: 
BETTINA J. RICHARDSON
Assistant United States Attorney